

Latest version issued	September 2024	
Review cycle	1 year	
Issue control		
Date for review	Comment	Updated by
September 2025	To be reviewed in line with KCSiE Updates in September each year	DSL

Low Level Concerns Policy

September 2024

Introduction

As part of its whole safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in or on behalf of the school (including supply teachers, volunteers, contractors and external lets).

This policy is written with regard to the relevant legal guidance from the DfE, especially Keeping Children Safe in Education 2024 as well as Working Together to Safeguard Children.

It should be read alongside the Safeguarding and Child Protection Policy and Staff Code of Conduct.

Low Level Concerns

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- deliberately humiliating a child
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone/other device
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language, Email, messaging, use of social media sites or other communication between adults and students outside agreed protocols

Low level concerns which do not meet the harms threshold must be shared responsibly, and with the right person, and recorded and dealt with appropriately. This enables the school to identify inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the school are clear about professional boundaries and act in accordance with the ethos and values of the school.

The school treats all allegations against adults with the same seriousness, whether these are members of staff, supply staff, contractors or from external lets and agencies using the school site. Allegations will be followed up to ensure the safety of all children involved. Reports about supply staff, contractors and external lets and agencies will also be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Staff must report any low level concerns to the Head or the DSL using the methods outlined above.

All staff are regularly trained in Safeguarding and reminded of the approach to low level concerns. The school has a poster that is on display in staff areas and offices reminding staff of how they should respond to low level concerns with a QR Code enabling them to report any concern via an online form. The DSL is immediately informed of any reports made this way. Staff are also aware of how to report any concerns in person or via email to the Head or the DSL.

Staff are also encouraged to self-refer if they believe they have found themselves in a situation which could be misinterpreted or on reflection they realise they have behaved in a way that falls below the expected professional standards.

Responding to Low Level Concerns

When a low-level concern has been raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible. The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and the action taken. They will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

All records of concerns will be logged by the Head and will be reviewed, with the DSL as needed, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

When a low-level concern has been raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible. The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and the action taken. They will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

All records of concerns will be logged by the Head and will be reviewed, with the DSL as needed, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.